

IN THE
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

Christopher Prosser, individually and)	
on behalf of all others similarly situated,)	
)	
Plaintiffs.)	
)	
Vs.)	No. 4:23-cv-00124 MTS
)	
USHealth Advisors, LLC, et al.,)	COMPLAINT CLASS ACTION
Registered Agent:)	
CT Corporation)	JURY TRIAL DEMANDED
120 S. Central Ave)	
Clayton, Mo. 63105; and)	
)	
)	
Defendants.)	

PLAINTIFF’S REQUEST FOR ISSUANCE OF SUMMONS

COMES NOW the Plaintiff, Christopher Prosser, by and through Counsel, Edwin V. Butler, and requests that summons be issued for all Defendant’s, for the following reasons:

1. After initially agreeing to return waivers of service by Defendant’s Counsel, Timothy Loose, Counsel began acting in bad faith and failed to file the agreed upon waivers.
2. Indeed, after discussing the matter with Defendants counsel, he conditioned settlement negotiations on Plaintiff’s dismissal of all Defendants with the exception of the USHealth Advisor, LLC Defendants.
3. In good faith and effort to resolve the litigation and save the Court’s resources, Plaintiff filed a motion dismissing all Defendants, with the exception of USHealth Advisors.

4. Defendant's counsel then refused to respond to emails, return myriad phone calls, or responded in bad faith, proffering excuse after excuse to delay any settlement negotiations, and delay and vex the course of the litigation, and ultimately brought the case to a point of dismissal for failure to obtain service.
5. Plaintiff therefore requests the Honorable Clerk of the Court issue the following summons so process can be perfected on the Defendants via express, certified mail, return receipt requested, and that all service fees be taxed against the Defendants:

USHealth Advisors, LLC
Registered Agent:
CT Corporation
120 S. Central Ave
Clayton, Mo. 63105

USHealth Advisors, LLC
CT Corporation – Registered Agent
1999 Bryan St., Ste. 900
Dallas, TX 75201-3136

Patrick Carr, President
USHealth Advisors, LLC
CT Corporation – Registered Agent
1999 Bryan St., Ste. 900
Dallas, TX 75201-3136

Troy A. McQuagge, Chief Executive Officer
USHealth Advisors, LLC
CT Corporation – Registered Agent
1999 Bryan St., Ste. 900
Dallas, TX 75201-3136

James White, Vice President
USHealth Advisors, LLC
CT Corporation – Registered Agent
1999 Bryan St., Ste. 900
Dallas, TX 75201-3136

USHealth Advisors, LLC
John and Jane Does 1 through 50
Call Center Telemarketers/Agents

CT Corporation – Registered Agent
1999 Bryan St., Ste. 900
Dallas, TX 75201-3136

UnitedHealth Group, Inc.
Agent: The Corporation Trust Company
1209 Orange St.
Wilmington, DE 19801

Andrew Witty, Chief Executive Officer
UnitedHealth Group, Inc.
Agent: The Corporation Trust Company
1209 Orange St.
Wilmington, DE 19801

Dirk McMahon, Chief Operating Officer
UnitedHealth Group, Inc.
Agent: The Corporation Trust Company
1209 Orange St.
Wilmington, DE 19801

Brian Thompson, Chief Executive Officer
UnitedHealth Group, Inc.
Agent: The Corporation Trust Company
1209 Orange St.
Wilmington, DE 19801

Respectfully submitted,

/s/Edwin V. Butler, Esquire
Edwin V. Butler Mo. 32489
Attorney At Law
Butler Law Group, LLC
1650 Des Peres Rd., Suite 220
St. Louis, MO 63131
edbutler@butlerlawstl.com
(314) 504-0001

Attorney for the Plaintiff

Certificate of Service

I hereby certify that the above and foregoing request for summons' was served electronically this 23rd day of May, 2023, on all Attorneys of record via CM/ECF filing and notification system. This document was also scanned for viruses using Windows Defender 2022 and is free of viruses and malware.

/s/Edwin V. Butler
Edwin V. Butler